

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

INDICTMENT

-v.-

S2 08 Cr. 124 (DLC)

JOSEPH RAY JORDAN, :

a/k/a "Patrick Jordan," :

a/k/a "Joe Jordan," :

a/k/a "Douglas Fidler," :

a/k/a "Joseph Landa," :

a/k/a "Jason Kaufman," :

a/k/a "Matthew McGlasson," :

Defendant. :

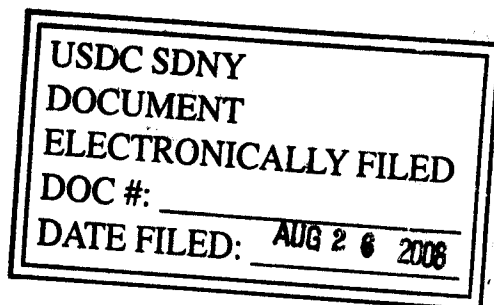
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COUNT ONE

Threatening Communications

The Grand Jury charges:

1. From on or about December 2007, up to and including January 11, 2008, in the Southern District of New York and elsewhere, JOSEPH RAY JORDAN, a/k/a "Patrick Jordan," a/k/a "Joe Jordan," a/k/a "Douglas Fidler," a/k/a "Joseph Landa," a/k/a "Jason Kaufman," a/k/a "Matthew McGlasson," the defendant, unlawfully, willfully, knowingly did transmit in interstate and foreign commerce communications containing threats to kidnap a person and threats to injure the person of another, to wit, JORDAN made telephone calls, and sent e-mails and facsimiles, in which JORDAN threatened to kidnap his former girlfriend ("Victim-1"), and to injure the person of Victim-1, Victim-1's aunt ("Victim-2"), and other members of Victim-1's immediate family.



(Title 18, United States Code, Section 875(c).)

COUNT TWO

Threats to an Internationally-Protected Person

The Grand Jury further charges:

2. From on or about December 2007, up to and including January 11, 2008, in the Southern District of New York and elsewhere, JOSEPH RAY JORDAN, a/k/a "Patrick Jordan," a/k/a "Joe Jordan," a/k/a "Douglas Fidler," a/k/a "Joseph Landa," a/k/a "Jason Kaufman," a/k/a "Matthew McGlasson," the defendant, unlawfully, knowingly, and willfully did threaten to assault, strike, wound, imprison, and offer violence to, and to violently attack the person of, and to make a violent attack on the private accommodation of an internationally protected person, in violation of Title 18, United States Code, section 112(a), and unlawfully, knowingly, and willfully threatened to seize and confine an internationally protected person, in violation of Title 18, United States Code, section 1201(a)(4), to wit, JORDAN made telephone calls, and sent e-mails and facsimiles, in which JORDAN threatened to attack the residence of Victim-2, who is an internationally protected person, and to seize and harm Victim-2 if Victim-2 resisted JORDAN's efforts to kidnap Victim-1.

(Title 18, United States Code, Section 878.)

COUNT THREE

Interstate Stalking

The Grand Jury further charges:

3. From on or about December 2007, up to and including January 11, 2008, in the Southern District of New York and elsewhere, JOSEPH RAY JORDAN, a/k/a "Patrick Jordan," a/k/a "Joe Jordan," a/k/a "Douglas Fidler," a/k/a "Joseph Landa," a/k/a "Jason Kaufman," a/k/a "Matthew McGlasson," the defendant, unlawfully, willfully, knowingly and with the intent to injure, harass, intimidate, and cause substantial emotional distress to a person in another State, and with the intent to place a person in another State in reasonable fear of the death of, and serious bodily injury to, that person, and a member of the immediate family of that person, did use an interactive computer service and a facility of interstate and foreign commerce to engage in a course of conduct that did cause substantial emotional distress to that person and did place that person in reasonable fear of the death of, and serious bodily injury to, that person and a member of the immediate family of that person, to wit, JORDAN made threatening telephone calls and sent facsimiles and email messages that caused Victim-1 substantial emotional distress, and placed Victim-1 in reasonable fear of the death of, and serious bodily injury to, Victim-1 and members of Victim-1's immediate family.

(Title 18, United States Code, Section 2261A(2).)

COUNTS FOUR THROUGH SIX

Mail Fraud

The Grand Jury further charges:

4. On or about the dates set forth below, in the Southern District of New York and elsewhere, JOSEPH RAY JORDAN, a/k/a "Patrick Jordan," a/k/a "Joe Jordan," a/k/a "Douglas Fidler," a/k/a "Joseph Landa," a/k/a "Jason Kaufman," a/k/a "Matthew McGlasson," the defendant, unlawfully, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations and promises, for the purpose of executing such scheme and artifice and attempting so to do, did place in a post office and authorized depository for mail matter, matters and things to be sent and delivered by the Postal Service, and did deposit and cause to be deposited matters and things to be sent and delivered by private and commercial interstate carriers, and did take and receive therefrom, such matters and things, and did cause to be delivered by mail and such carriers, according to the direction thereon, such matters and things, to wit, JORDAN, having devised a scheme to fraudulently obtain the personal identification information of other individuals, and to use that information to obtain credit cards, debit cards and bank accounts in the names of those individuals without their knowledge or authorization,

caused the following items, as described in the table below, to be delivered by mail to addresses in the Southern District of New York:

Count	Mailing	Address Mailed to	Approximate Date of Mailing
4	Background check form from Victim-3	123 Essex Street #47 New York, NY 10002	January 2007
5	Background check form from Victim-4	39 Bowery, #614 New York, NY 10002	January 2007
6	Background check form from Victim-5	39 Bowery, #614 New York, NY 10002	March 2007

(Title 18, United States Code, Sections 1341 and 2.)

COUNT SEVEN

Aggravated Identity Theft

The Grand Jury further charges:

5. From at least in or about 2005, up to and including on or about January 11, 2008, in the Southern District of New York and elsewhere, JOSEPH RAY JORDAN, a/k/a "Patrick Jordan," a/k/a "Joe Jordan," a/k/a "Douglas Fidler," a/k/a "Joseph Landa," a/k/a "Jason Kaufman," a/k/a "Matthew McGlasson," the defendant, unlawfully, willfully, and knowingly did transfer, possess, and use, without lawful authority, a means of identification of another person during and in relation to a felony enumerated in Section 1028A(c), to wit, JORDAN possessed and used means of identification belonging to other individuals that were mailed to JORDAN to obtain unauthorized credit cards,

debit cards and bank accounts as charged in Counts Four through Six of this Indictment.

(Title 18, United States Code, Sections 1028A and 2.)

COUNT EIGHT

Access Device Fraud

The Grand Jury further charges:

6. From at least in or about 2005, up to and including on or about January 11, 2008, in the Southern District of New York and elsewhere, JOSEPH RAY JORDAN, a/k/a "Patrick Jordan," a/k/a "Joe Jordan," a/k/a "Douglas Fidler," a/k/a "Joseph Landa," a/k/a "Jason Kaufman," a/k/a "Matthew McGlasson," the defendant, unlawfully, willfully, and knowingly and with intent to defraud did effect transactions, with one and more access devices issued to another person or persons, to receive payment and things of value during a one-year period, the aggregate value of which is equal to and greater than \$1,000, which conduct did affect interstate and foreign commerce, to wit, JORDAN, during a one-year period, made use of credit cards, debit cards, and bank account numbers issued in the names of other individuals without their knowledge or authorization, to purchase goods and make cash withdrawals from automated teller machines.

(Title 18, United States Code, Sections 1029(a)(5) and 2.)

COUNT NINE

Possessing Fraudulent Access Devices

The Grand Jury further charges:

7. From at least in or about 2005, up to and including on or about January 11, 2008, in the Southern District of New York and elsewhere, JOSEPH RAY JORDAN, a/k/a "Patrick Jordan," a/k/a "Joe Jordan," a/k/a "Douglas Fidler," a/k/a "Joseph Landa," a/k/a "Jason Kaufman," a/k/a "Matthew McGlasson," the defendant, unlawfully, willfully, and knowingly and with intent to defraud did possess fifteen and more devices which are counterfeit and unauthorized access devices, which conduct did affect interstate and foreign commerce, to wit, JORDAN possessed at least fifteen unauthorized credit cards, debit cards, and bank account numbers issued in the names of other individuals.

(Title 18, United States Code, Sections 1029(a)(3) and 2.)

COUNT TEN

Aggravated Identity Theft

The Grand Jury further charges:

8. From at least in or about 2005, up to and including on or about January 11, 2008, in the Southern District of New York and elsewhere, JOSEPH RAY JORDAN, a/k/a "Patrick Jordan," a/k/a "Joe Jordan," a/k/a "Douglas Fidler," a/k/a "Joseph Landa," a/k/a "Jason Kaufman," a/k/a "Matthew McGlasson," the defendant, unlawfully, willfully, and knowingly did transfer, possess, and

use, without lawful authority, a means of identification of another person during and in relation to a felony enumerated in Section 1028A(c), to wit, JORDAN possessed and used means of identification belonging to other individuals to obtain and use unauthorized credit cards, debit cards, and bank account numbers, as charged in Counts Eight and Nine of this Indictment.

(Title 18, United States Code, Sections 1028A and 2.)

COUNT ELEVEN

Witness Tampering

The Grand Jury further charges:

9. From at least in or about February 2008, up to and including at least in or about June 2008, in the Southern District of New York and elsewhere, JOSEPH RAY JORDAN, a/k/a "Patrick Jordan," a/k/a "Joe Jordan," a/k/a "Douglas Fidler," a/k/a "Joseph Landa," a/k/a "Jason Kaufman," a/k/a "Matthew McGlasson," the defendant, unlawfully, willfully and knowingly did use intimidation, threaten, and corruptly persuade, and did attempt to do the same, and did engage in misleading conduct towards, another person, with intent to influence, delay, and prevent the testimony of a person in an official proceeding, and to cause and induce a person to withhold testimony from an official proceeding, to wit, JORDAN caused written communications containing intimidating, threatening, and misleading content to

be sent to Victim-1 to influence or prevent Victim-1's testimony in the instant proceeding.

(Title 18, United States Code, Section 1512(b).)

COUNT TWELVE

Witness Tampering

The Grand Jury further charges:

10. From at least in or about May 2008, up to and including at least in or about June 2008, in the Southern District of New York and elsewhere, JOSEPH RAY JORDAN, a/k/a "Patrick Jordan," a/k/a "Joe Jordan," a/k/a "Douglas Fidler," a/k/a "Joseph Landa," a/k/a "Jason Kaufman," a/k/a "Matthew McGlasson," the defendant, unlawfully, willfully and knowingly did use intimidation, threaten, and corruptly persuade, and did attempt to do the same, and did engage in misleading conduct towards, another person, with intent to influence, delay, and prevent the testimony of a person in an official proceeding, and to cause and induce a person to withhold testimony from an official proceeding, to wit, JORDAN caused written communications containing intimidating, threatening, and misleading content to be sent to be sent to the government for which Victim-2 serves as an internationally-protected person to influence or prevent Victim-2's testimony in the instant proceeding.

(Title 18, United States Code, Section 1512(b).)

FORFEITURE ALLEGATION

AS TO COUNTS FOUR THROUGH TEN

9. As a result of committing the offenses alleged in Counts Four through Twelve of this Indictment, JOSEPH RAY JORDAN, a/k/a "Patrick Jordan," a/k/a "Joe Jordan," a/k/a "Douglas Fidler," a/k/a "Joseph Landa," a/k/a "Jason Kaufman," a/k/a "Matthew McGlasson," the defendant, shall forfeit to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, constituting or derived from proceeds obtained directly or indirectly as a result of the mail fraud, access device fraud, and aggravated identity theft offenses set forth in the above counts.

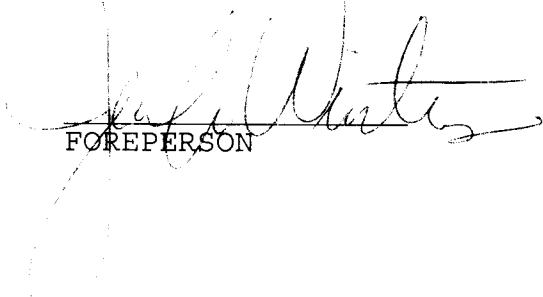
Substitute Asset Provision

10. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:


- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or

(5) has been commingled with other property which cannot be subdivided without difficulty; it is the intent of the United States, pursuant to 28 U.S.C. § 2461, to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981,
Title 28, United States Code, Section 2461.)



FOREPERSON



MICHAEL J. GARCIA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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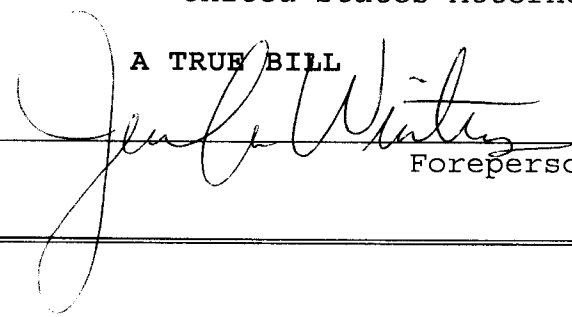
INDICTMENT

S2 08 Cr. 124 (DLC)

(18 U.S.C. §§ 875, 878, 2261A,
1341, 1028A, 1029, 1512 & 2.)

MICHAEL J. GARCIA
United States Attorney.

A TRUE BILL


Foreperson.
